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August 16, 2018

VIA ECF AND E-MAIL

Honorable Kimba M. Wood
Senior United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Steven Brown, 16 Cr.436 (KMW)

Dear Judge Wood:

We represent Defendant Steven Brown in the above-referenced matter and we are writing to respectfully request an adjournment of his sentencing date, which is currently scheduled for September 18. We have been in discussions with the Government and they join in this request for an adjournment of sentence until on or about November 14. Accordingly, we also respectfully request that the due date for Defendant's sentencing memorandum, currently due on September 4, 2018, be extended to 14 days prior to any new sentencing date, and that the due date for the Government's sentencing memorandum be extended to 7 days prior to the new date. Additionally, Probation has requested that the due date for the final PSR, currently due on September 4, 2018, be extended to 21 days prior to the new date.

The reason for this application is that the Government and the defense are engaged in ongoing discussions regarding Defendant's objections to the preliminary PSR, restitution issues, and additional matters relevant to sentencing, and need this additional time to try to resolve these issues. Mr. Brown's location in California and his need for ongoing medical tests have also

KMW
Granted. Sentencing is adjourned to Nov. 15, 2018, at 2:30 p.m. The presentence report is due Oct. 24. Defendant's submission is due Nov. 1. The government's submission is due Nov. 8.

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hindered our progress. Furthermore, we have been advised that AUSA Solowiejczyk is expected to be engaged in a lengthy trial in October. This additional time will allow the parties to be prepared for sentencing.

This is the second request for an adjournment of sentence.

We thank the Court for its consideration.

Respectfully submitted,



Walter Mack

cc: (via email): AUSA Katherine Reilly
AUSA Noah Solowiejczyk
Officer Ross Kapitanksy (Probation)

8-17-18

SO ORDERED, N.Y., N.Y.


KIMBA M. WOOD
U.S.D.J.